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3 Eastern District of Washington  
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9 UNITED STATES DISTRICT COURT  
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 SETH RANGLES,

15 Defendant.

Case No. 2:17-CR-00222-SAB-1

UNITED STATES' REQUEST FOR  
CONTINUANCE OF RESTITUTION  
ISSUES TO A SEPARATE  
HEARING WITHIN 90 DAYS

Sentencing Hearing:  
October 7, 2021, at 1:30 p.m.  
Spokane, Washington

16 Plaintiff United States of America, by and through Joseph H. Harrington, Acting  
17 United States Attorney for the Eastern District of Washington, and David M. Herzog,  
18 Assistant United States Attorney for the Eastern District of Washington, hereby requests  
19 a continuance of 90 days for the restitution portion of Defendant Seth Randles  
20 ("Defendant")'s sentence. *See* 18 U.S.C. § 3664(d)(5).

21 On September 30, 2021, the United States received a Victim Impact Statement  
22 from Victim M. The United States submitted the Victim Impact Statement to the United  
23 States Probation Office, which supplemented the Presentence Investigation Report  
24 ("PSIR") with the Victim Impact Statement on October 1, 2021. ECF No. 112.

1 In connection with her Victim Impact Statement, Victim M has informed the  
2 United States Attorney's Office that she believes she has suffered financial losses  
3 attributable to Defendant. Among these are a bankruptcy that Victim M had to file after  
4 suffering financial harm caused by Defendant, and dental bills that she accrued when  
5 Defendant punched her in the face. To ascertain the proper value of Victim M's actual  
6 losses and whether they are properly attributable to Defendant as restitution, the United  
7 States needs to obtain documents related to Victim M's bankruptcy and dental issues.

8 Victim M articulated these restitution issues in connection with the Victim Impact  
9 Statement she submitted on or about September 30, 2021. Given that timing, the United  
10 States has not been able to ascertain and substantiate her actual losses more than 10 days  
11 prior to the sentencing hearing on October 7, 2021. Pursuant to 18 U.S.C. § 3664(d)(5),  
12 the United States is hereby informing the Court of the situation and requesting a  
13 continuance of the restitution portion of Defendant's sentencing for up to 90 days.

14 To be clear, the United States is requesting only that the restitution portion of the  
15 sentencing hearing be continued for up to 90 days, not the substantive sentencing  
16 hearing itself. To the contrary, the United States and Victim M are eager to proceed  
17 with the substantive sentencing hearing on October 7, 2021, and have made significant  
18 logistical arrangements in preparation for that hearing.

19 The United States' goal in filing this request prior to the substantive sentencing  
20 hearing on October 7, 2021, is merely to minimize surprises at the hearing. The United  
21 States anticipates that the Court will be in a position to address its request at the hearing,  
22 such that a separate written order addressing the request prior to the hearing is  
23 unnecessary.

24 October 1, 2021

Joseph H. Harrington  
Acting United States Attorney

26 s/ David M. Herzog  
27 David M. Herzog  
28 Assistant United States Attorney

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*s/ David M. Herzog*  


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David M. Herzog  
Assistant United States Attorney